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FCC Mail Room

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March 17, 2008

Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

To: Federal Communications Commission

RE: MB Docket No. 04-233

I am greatly concerned about the proposed resolution to make repeater radio stations secure an office and have it staffed 24 hours a day 7 days a week.

In the Meadville, Pa. area there are several commercial stations that can provide communications to the area in case of emergencies.

If the proposed resolution of 24/7 becomes a ruling we would have to find an office building, staff it every hour of operation, and still not be able to communicate with the area of Meadville since we just operate with our repeater equipment. I could understand if you would grandfather the current repeaters and apply this 24/7 to any future licenses. To give permission to construct a repeater and then add this burdensome resolution would force many repeaters to just cease from operation and lose immeasurable amounts of money.

Please don't pass this proposed resolution of 24/7, and I encourage the Commission to look favorably on repeaters. Thank you for your time and consideration.

Sincerely,

James Taylor
Board Member

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LG ABCDE

Wayne Jarvis
KUNI/KHKE, Iowa Public Radio
324 Communication Arts Center
The University of Northern Iowa
Cedar Falls, Iowa 50614

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IOWA PUBLIC RADIO

March 14, 2008

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

MAR 24 2008

RE: MM Docket No. 04-233

Dear Ms. Dortch:

As the manager of public stations KUNI and KHKE, I'd like to offer comments on the matter of broadcast localism (MM Docket No. 04-233). KUNI and KHKE are licensed to the University of Northern Iowa and we are member stations of Iowa Public Radio.

I applaud the Commission's desire to support broadcast localism and diversity, increasing the amount and nature of broadcast programming that is targeted to needs and interests of the communities we serve. This is a worthy goal and one that KUNI and KHKE take very seriously. I write to the Commission now, however, to ask you to refrain from imposing restrictions and requirements on non-commercial radio stations that would create financial and resource hardships, thereby limiting our ability to nimbly serve our local audience's needs.

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Public radio stations in Iowa have a long and proud history of local community presence and commitment to locally-relevant programming. This has been critical to Iowa Public Radio's success. Iowa Public Radio stations have a weekly audience of more than 220,000 people and we have more than 20,000 supporting members.

KUNI/KHKE and the other stations of Iowa Public Radio provide extensive local news coverage and original talk programming that informs Iowans of issues affecting their communities and their state. We invite members of the audience into the discussion with two daily talk programs, *The Exchange* and *Talk@12*. Our large reporting staff covers issues affecting communities throughout Iowa as well as news from the Statehouse in Des Moines. In a major effort to inform the voting public in this election cycle, we have brought the presidential campaigns of both parties – which truly get underway here in Iowa – to our listeners, following the candidates around the state to explain how their messages are shaped and communicated to voters.

Original cultural and musical programming is another way in which KUNI/KHKE and our fellow stations of Iowa Public Radio serve local community needs and interests. Our local program initiatives include *Live from Studio One*, which is produced in front of a live audience at our studios in Cedar Falls and elsewhere across Eastern Iowa, showcasing a variety of Iowa and Midwestern

singer/songwriters and instrumental musicians. Additionally we produce a unique weekly program *Down On The Corner* featuring recordings of area and regional bands that are not heard on commercial radio. Other programs specifically featuring local and regional musicians include *Folk Music with Karen Impola* and *Evening Music with Al Schares and Mark Simmet*.

Public radio is local, not only because much of our programming has a local focus but because we draw upon Iowa listeners and local business underwriters for direct financial support. We also partner with area organizations to promote a better quality of life in Iowa. KHKE produces and airs concerts by the Waterloo-Cedar Falls Symphony Orchestra and we collaborate with our fellow stations of Iowa Public Radio (WOI and KSUI) to present two other Iowa orchestras: the Cedar Rapids Symphony and the Des Moines Symphony.

These public stations are definitely “on the ground” as community participants in Iowa. We have paid staff in multiple locations as well as regional advisory boards established to give us feedback on our work. We are governed by the Iowa State Board of Regents and the Iowa Public Radio Board of Directors which meets throughout the year and whose meetings are open to the public. The Friends of KUNI/KHKE was established three decades ago and the members of the Friends come from a wide geographical area within reach of our signals, representing many different occupations and ages. The Friends meet 10 times a year and is one way in which we stay in touch with our listeners. Iowa Public

Radio has also undertaken a number of additional efforts to engage with our listeners. We surveyed over 2,000 Iowans in the 2006/2007 Iowa Listening Project Phase I. We expect to begin Phase II of the Listening Project in fall 2008. We have spent a great deal of effort building the Iowa Public Radio website (www.iowapublicradio.org) so that it can not only provide current information on programming, membership, station history and the like, but also podcasts of Iowa Public Radio programs, news reports and feature stories as well as a very special "contact" form that links listeners with management and staff of the station. Listeners contact us with comments and questions and each person receives an individual response from IPR staff. We strongly believe in transparency to the public and post our financial and employment reports on our website.

Another area of concern for my station and other public stations is the proposed regulation prohibiting automated broadcast transmissions. KUNI and KHKE have invested heavily in state-of-the-art equipment and automation systems which can carry our Iowa-produced programming to most corners of Iowa. We believe the people of Iowa are well-served by these investments and fear that a requirement to staff each control room 24 hours a day would prevent us from hiring the reporters, producers and other staff that tangibly improve local program offerings.

The requirement to provide a main studio in the city of license is also cost-prohibitive. Main studio waivers have enabled rural public radio stations to serve large geographic areas in this country that could not possibly support stand-alone

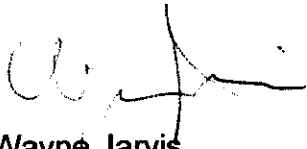
stations. Iowa Public Radio would find it very difficult to provide its current level of service to communities in rural areas with low population numbers if we had to provide a main, staffed studio in each station location.

One further concern we have is the potential for new regulatory requirements such as mandatory minimum program origination obligations, enhanced disclosure requirements, and new license renewal processing guidelines which would increase our administrative costs at a time when our resources are already stretched thin. We are a local, public, non-profit educational organization that depends on its community for continued existence and we believe that we are fulfilling our public service mission by honoring the regulations already in place.

In conclusion, the stations of Iowa Public Radio recognize that relevance to our local area is critical to our survival as publicly-supported stations. We feel that the imposition of any further restrictions or regulations on public radio organizations would drain resources and endanger the fine balance that now exists between an active local programming effort and the global programming we offer the curious citizens of Iowa. This intelligently-crafted balance has been the hallmark of our stations since their inception and we are hopeful that the Commission will recognize that public radio stations can serve the needs of their listeners best when freed from new and potentially onerous federal regulations and allowed to respond with flexibility to the needs of their own, local communities.

I thank you for the opportunity to comment on the proposed rulemaking.

Sincerely,

A handwritten signature in black ink, appearing to read 'Wayne Jarvis', with a stylized flourish at the end.

Wayne Jarvis
Station Manager, KUNI/KHKE FM
Director of Network Operations, Iowa Public Radio

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